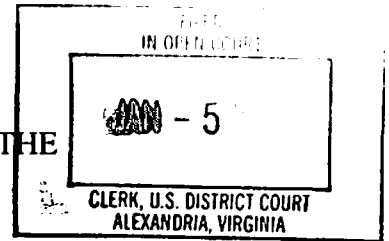


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 1:11CR07
)	
v.)	Count 1: 18 U.S.C. § 875 (c)
)	(Interstate Threatening Communications)
AWAIS YOUNIS,)	
)	
also known as Sundullah "Sunny")	
Ghilzai,)	
Defendant.)	

JANUARY 2011 TERM - At Alexandria

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times material to this indictment:

1. The defendant, Awais Younis, also known as Sundullah "Sunny" Ghilzai, lives in Arlington, Virginia.
2. The victim lives in Louisiana.
3. The victim's father lives in the Washington, D.C. metropolitan area and takes Metro to work.
4. The defendant, Awais Younis, also known as Sudullah "Sunny" Ghilzai, and the victim had communications through Facebook, an online social networking site.
5. The defendant described to the victim in November 2010, a potential attack on the Metro.

COUNT ONE

(Interstate Threatening Communications)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the GENERAL ALLEGATIONS of this Indictment.
2. Between on or about November 2010 and on or about December 5, 2010, within the Eastern District of Virginia the defendant, Awais Younis, also known as Sundullah "Sunny" Ghilzai, knowingly and willfully did transmit in interstate and foreign commerce from Arlington, Virginia to the State of Louisiana, a communication to K.D.'s Facebook page, containing a threat to injure K.D. directly and indirectly by harming her father, specifically "BITCH I know what you are up too and you better stop if you know what is good for you!!!! . . . that is the problem with americans they cant leave well enough alone until something happends then they sit there wondering why we dropped the twin towers like a bad habit hahaha. [I']m telling you right now you are going to regret doing what you did. For your peace [I] hope what [I] am hearing is all lies. . . . you should be nervous. [Y]ou pissed me off. [W]hen things happen it will be your fault. just wait and see. [I]ts only a matter of time. . . . you want a reason to complain about me and my people. [I] will give you one . . . the only way to make things ok with me is to fear me.

[T]hat [I] will prove. GET READY!whats a matter spoiled brat are you scared? tell your father to cancel work tomorrow “

(In violation of Title 18, United States Code, Section 875 (c).)

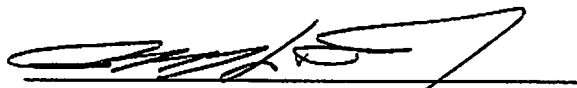
A TRUE BILL;

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON OF THE GRAND JURY

Neil H. MacBride
United States Attorney

By:



Ronald L. Walutes, Jr.
Assistant United States Attorney